

Corporate Social Responsibility Policy

MELCO INDIA PVT LTD

1. PREAMBLE

Corporate Social Responsibility is strongly connected with the principles of Sustainability; an organization should make decisions based not only on financial factors, but also considering the social and environmental consequences. As a Corporate Citizen receiving various benefits out of society, it is our co-extensive responsibility to pay back in return to the society in terms of helping needy people by providing foods, clothes, etc., keeping the environment clean and safe for the society by adhering to the best industrial practices and adopting best technologies, and so on. It is the Company's intention to make a positive contribution to the society in which the Company operates.

2. CSR POLICY: SCOPE AND OBJECTIVES

In order to carry out the charitable activities in a structured manner and to streamline and provide more focus and direction to the activities undertaken by the Company in its sphere, it is decided to formulate a policy on Corporate Social Responsibility (hereinafter described as **"the Policy"**).

Further, Section 135 of the Companies Act, 2013 (hereinafter described as **"Section 135"**) and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter described as **"the rules"**) have also laid down Guidelines for CSR Programme for the Companies falling into the criteria of mandatory provision for CSR which is Net Profit of rupees five crores or more during a financial year.

This policy is formulated in line with the requirements of the Companies Act, 2013 (hereinafter described as **"the Act"**) and shall be applicable on uniform basis.

3. CSR COMMITTEE

A. Composition:

The Corporate Social Responsibility Committee (CSR Committee) shall comprise of the following Directors of the Board of Directors of the Company as members of CSR Committee:

Mr. V K MALIK

Mr. SANDHEER MALIK

B. Role: The Committee, referred above, shall

- (a) formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company as specified in Schedule VII of the Companies Act, 2013;
- (b) recommend the amount of expenditure to be incurred on the activities referred to in clause (a);
- (c) monitor the Corporate Social Responsibility Policy of the company from time to time.
- (d) Institute a transparent monitoring mechanism for implementation of the CSR projects or programs or activities undertaken by the company.
- (d) Any other matter as the CSR Committee may deem appropriate to discharge its functions or as may be directed by the Board of Directors from time to time.;

4. AREAS OF ACTIVITIES TO BE UNDERTAKEN

- (i) eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water:
- (ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- (iii) promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- (iv) ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, conservation of natural resources and maintaining quality of soil, air and water;
- (v) protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional and handicrafts:
- (vi) measures for the benefit of armed forces veterans, war widows and their dependents;
- (vii) training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;
- (viii) contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Caste, the Scheduled Tribes, other backward classes, minorities and women;

- (ix) contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government
- (x) rural development projects.

The Company will review the sectors from time to time and make additions/deletions/clarifications to the above sectors.

5. IMPLEMENTATION OF CSR ACTIVITIES

CSR initiatives of the Company shall consider the following parameters for identification/selection of schemes/projects:

- (i) Thrust shall be given wherever possible to areas related to the business of the Company as a natural corollary to the business.
- (ii) CSR activities shall generate community goodwill, create social impact and visibility.
- (iii) For every project, the time frame and periodic milestones shall be finalized at the outset.
- (iv) CSR activities shall also involve the suppliers in order to ensure that the supply-chain also follows the CSR principles.
- (v) CSR activities shall help in building a positive image of the company in the public perception.
- (vi) CSR activities may also be related to Programmes on Environment.
- (vii) CSR projects may be closely linked with the principles of Sustainable Development, based on the immediate and long-term social and environmental consequences of their activities.
- (viii) The Company shall shoulder responsibility for restoring / compensating for any ecological damage that is taking place as a result of its operations.
- (ix) Care may be taken for fulfillment of the education and skill enhancement, empowerment and support, ensuring gender sensitivity, entrepreneurship development and employment generation by co-creating value with local institutions/people etc.
- (x) CSR activities may be implemented through specialized agencies, which may include one or more of the following:-
 - i) Community based organizations;
 - ii) Elected local bodies such as Panchayats;
 - iii) Voluntary Agencies (NGOs);
 - iv) Trusts, Missions, etc.;
 - v) Self-help Groups in the form of registered societies;
 - vi) Contracted agencies for civil works;
 - vii) Professional Consultancy Organizations, etc.
 - (viii) Donations to philanthropic/ charity or other organizations for the CSR activities mentioned in clause

The Company shall generate awareness among all levels of their staff about CSR activities and the integration of social processes with business processes. Those involved with the undertaking

of CSR activities shall be provided with adequate training and re-orientation. While assigning CSR projects to specialized agencies, every possible effort shall be made to verify the reliability and clean track record of such agencies.

6. THE CSR BUDGET

- i. The amount of expenditure to be spent for CSR and the projects, programmes or activities undertaken in each financial year will be recommended by the CSR Committee of the Company and the same will be approved by the Board of Directors with or without modification in their meeting held in each financial year.
- ii. The Annual CSR Budget shall be spent on activities laid down in this Policy.
- iii. Any surplus arising and/or additional revenue generated out of CSR Activities undertaken by the Company shall not form part of the business profit of the Company and same shall be spent for undertaking any CSR Activities only.
- iv. In case the Company fails to spend the above targeted amount in that particular financial year, the Committee shall submit a report in writing to the Board of Directors specifying the reasons for not spending the amount which in turn shall be reported by the Board of Directors in their Directors' Report for that particular Financial Year.

7. PROCEDURE FOR CSR ACTIVITIES

- i. The Committee shall recommend the Board suitable CSR Activities to be undertaken during for the financial year along with the detailed plan, modalities of execution, implementation schedule, monitoring process and amount to be incurred on such activities;
- ii. The Board shall give its approval based on the recommendation of the Committee and in compliance of this Policy;
- ii. The Committee, after approval, shall submit its report giving status of the CSR Activities undertaken, Expenditure Incurred and such other details as may be required by the Board.

8. TERRITORY FOR CSR SPEND

The Company should give preference to the local area and areas around the project sites, registered office, branch offices and administration offices of the Company for spending the amount earmarked for CSR activities

9. CSR MONITORING AND REPORTING MECHANISM

The CSR Committee shall monitor the amount of expenditure as approved by the Board of Company. Apart from the above, the Directors' Report of the Company shall include an annual report on CSR containing the particulars in the prescribed format. CSR initiatives of the Company will be reported in the Board's Report in compliance with Section 135 and rules made thereunder.

10. AMENDMENT TO THE POLICY

The Board of Directors may amend this Policy from time to time as the situation warrants and as may be recommended by the CSR Committee.